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Sent: 3/4/2019 8:06:37 PM
To: Wang, Guangyu@Waterboards [Guangyu.Wang@waterboards.ca.gov]
CC: Tom Ford [tford@santamonibay.org]; Yelensky, Erica [Yelensky.Erica@epa.gov]
Subject: Comments to FY 2020 draft Work Plan

Hi Guangyu,

Below are the Land Trust's comments in response to the draft FY 2020 Work Plan that was shared at the February Governing Board meeting. These comments are intended to be in addition to, not in place of, previous comments submitted by the Land Trust regarding work plans, action plans, and other aspects of the SMBRC's operations. Thank you for your consideration of these and previous comments.

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Ballona Wetlands

Please provide more detail regarding the role of the SMBRC in coordinating and advising both near and long-term restoration and management policies, especially as that role involves the Governing Board and Technical Advisory Committee. SMBRC is listed as a corroborating partner in the CCMP action plan, but there is no specific detail as to what that means with regard to this project. As the Land Trust has previously argued, SMBRC has non-regulatory authority to coordinate and advise any state program affecting the Bay or its watershed, but SMBRC has been effectively sidelined from this role in the last four to five years.

Page 18 indicates that the objective for the community restoration project is "[t]o restore four acres of degraded wetland and transition habitat." Presumably, this refers to the three acres under TBF's existing permit (referenced on page 9), plus one acre from the existing Friends of Ballona Wetlands project area, but that should be made clear in the work plan to avoid confusion.

The new work plan format only includes long-term outcomes, not short-term outcomes. Perhaps I overlooked it, but I did not see any explanation for that change in the plan itself or in the staff report. Please explain in the work plan why short-term objectives (previously defined as 1 to 5 years) are no longer included. Additionally, please retain the short-term objectives that were previously recorded for the Ballona Wetlands, such as interim access, stewardship and educational opportunities. Staff's previous response to the Land Trust's WAC meeting comments on the issue of access ignored the important distinction between interim access, which can benefit the ecological reserve and the public right now, and post-restoration access, which could be up to fifteen years or more away. Please also provide the time-range that is intended to be conveyed for long-term objectives (i.e. 5 to 20 years or something else?).

Additionally, the Land Trust has been requesting for many years for a work group or committee to be established that is dedicated to the complex issues facing the Ballona Wetlands. This would allow a more thoughtful discussion of these issues in coordination with the Technical Advisory Committee, and would facilitate the submission of consensus policy recommendations to the SMBRC Governing Board. Potential issues for work group discussion include interim access, native re-vegetation policies, commercial parking in the ecological reserve, protection of important species, etc. The Land Trust is fully aware that any work group or committee would have only an advisory function to the

Governing Board, and that the Governing Board itself has only an advisory role with regard to the Ballona Wetlands, other than as it pertains to the activity of NEP staff in that project. Advisory functions are an important element of sound policy-making. Please add discussion of the purpose for including a description of work groups in the MOU, and what role work groups can have in benefiting various work plan objectives.

SMBRC Staffing

The work plan should increase SMBRC staffing levels to in response to multiple Governing Board member comments to the effect that SMBRC staffing is constraining the work of the agency.

Budget

The budget section of the work plan should provide more detail than the FY 2019 work plan did with regard to how money is actually being spent. For instance, if additional Section 320 grant funds are to be allocated to the Ballona Wetlands community restoration project - the purpose of those funds should be explained in detail (i.e. staff, materials, native plants or seed collection). The standard for detail should be set by what is most informative to the Governing Board and to the public, not merely the minimal requirements as TBF interprets them.

The work plan should also clarify that SMBRC has full control over expenditure of the section 320 funds as the agency authorized to develop and approve the work plan, the document that allows funds to be disbursed and which determines how funds are spent.

SMBRC Orientation Process

Although relatively few Governing Board members have provided feedback regarding SMBRC's structure and governance, there has been a strong consensus among those who have that new and existing board members would benefit from a formal orientation process that explains SMBRC's role in the NEP and its relationship to other entities. Establishing an effective orientation process will require staff time, and should be discussed in the work plan. Currently, the only reference to a orientation in the draft work plan is a link to the existing orientation page. Governing Board members and the public should have access to the same orientation materials, which should include not just the text of state laws, federal regulations and other governing documents, but also interpretation and guidance relating to those documents, as well as answers to questions posed by Governing Board members and the public.